

The Honorable Judge John C. Coughenour

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,	)	
	)	NO. CR20-146JCC
Plaintiff,	)	
	)	
vs.	)	DEFENDANT'S REPLY TO
	)	GOVERNMENT'S RESPONSE TO
JESUS DANIEL LERMA-JARAS,	)	DEFENDANT'S MOTION FOR
	)	REVIEW OF DETENTION ORDER
Defendant	)	
	)	

REPLY

The government does not directly respond to Mr. Lerma-Jaras' argument as to why he should be released pending trial. Instead it simply regurgitates its interpretation of the "facts" of this case and then makes conclusory statements which we address below.

First, the government believes that Mr. Lerma-Jaras would be a danger to the community because of the "nature and circumstances of the charges" against him. Yet the government waited for two years before even indicting Mr. Lerma-Jaras and throughout that time he remained free without any concern on the part of the government. As a result, the government's newfound concern regarding Mr. Lerma-Jaras' dangerousness is disingenuous.

DEFENDANT'S REPLY TO  
GOVERNMENT'S RESPONSE TO  
DEFENDANT'S MOTION FOR REVIEW  
OF DETENTION ORDER

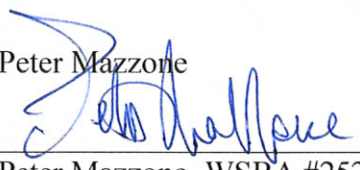
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1 Second, the government believes that “there is little reason for Lerma-Jaras to  
2 remain in the area to face these charges” and therefore, the government concludes, he  
3 is a flight risk. What the government fails to mention, however, is that Mr. Lerma-  
4 Jaras has a lovely, devoted wife and two adorable children that are, and always have  
5 been, the very reason for his existence. It necessarily follows that he has every reason  
6 to remain with them instead of fleeing, alone, to Mexico, where he has not been for at  
7 least twenty years.

9 We agree with the pre-trial services officer who correctly observed that “there  
10 appear to be conditions of release that would reasonably assure future Court  
11 appearances and address danger to other persons or the community.” Therefore, we  
12 recommend that the defendant be released with all conditions recommended by pre-  
13 trial services officer Leona Nguyen.  
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15 Respectfully submitted this 5<sup>th</sup> day of November, 2020.  
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18 Peter Mazzone

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20 Peter Mazzone, WSBA #25262  
21 Attorney for Defendant  
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28 DEFENDANT’S REPLY TO  
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